

BECKER & POLIAKOFF LLP

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Presentment Date: August 13, 2015 at 12:00 noon

Objection Date: August 10, 2015

*Attorneys for Defendants The Lazarus-Schy Family Partnership, A
Florida General Partnership, The Schy Family Partnership, A Florida
General Partnership, Zipora Lazarus, Ira Schy, Rose Schy, Michael
Lazarus, Jared Lazarus, Terry Lazarus, Linda Lazarus, Ida Lazarus,
Elan Schy, Lisa Schy, Steve Schy, Doran Schy, B. S., A Minor, J. S., A
Minor, M. S., A Minor, And Abe Schy, As An Individual, And As
Custodian For B. S., J. S., And M. S.*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-1789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation of
Bernard L. Madoff Investment Securities LLC

Plaintiff,

v.

THE LAZARUS-SCHY FAMILY PARTNERSHIP,
a Florida general partnership, *et al.*,

Defendants.

Adv. Pro. No. 10-05190 (SMB)

**DECLARATION OF HELEN DAVIS CHAITMAN IN SUPPORT
OF AN APPLICATION ON CONSENT
FOR AN ORDER TO WITHDRAW AS COUNSEL**

I, Helen Davis Chaitman, hereby declare, under penalty of perjury pursuant to 28 U.S.C. §1746, as follows:

1. I am a partner with Becker & Poliakoff LLP, counsel of record to Defendants The Lazarus-Schy Family Partnership, A Florida General Partnership, The Schy Family Partnership, A Florida General Partnership, Zipora Lazarus, Ira Schy, Rose Schy, Michael Lazarus, Jared Lazarus, Terry Lazarus, Linda Lazarus, Ida Lazarus, Elan Schy, Lisa Schy, Steve Schy, Doran Schy, B. S., A Minor, J. S., A Minor, M. S., A Minor, And Abe Schy, As An Individual, And As Custodian For B. S., J. S., And M. S., (the “BP Defendants”). I submit this declaration in support of an application for an Order pursuant to Rule 2090-1(e) of the Local Bankruptcy Rules of this Court: (1) authorizing Becker & Poliakoff LLP to withdraw as counsel to the BP Defendants; and (2) granting such other and further relief as the Court deems just and proper. Unless otherwise stated, the foregoing is based on my personal knowledge.

2. Counsel for the Trustee does not object to the relief requested herein.

3. The Trustee commenced this adversary proceeding against the BP Defendants on December 3, 2010 (the “Adversary Proceeding”).

4. After the Adversary Proceeding was commenced, the BP Defendants retained Becker & Poliakoff LLP to represent them herein.

5. On behalf of the BP Defendants in this Adversary Proceeding Peter W. Smith and I filed Notices of Appearance and Requests for Service of Papers on March 24, 2011. (ECF Doc. Nos. 5 and 6).

6. Differences have arisen between the BP Defendants and this firm which have made it impossible for us to continue to represent them.

7. Prior to making this application, I communicated with the BP Defendants to confirm that I intended to make this application. I further informed them of the deadline to respond to the Trustee's complaint in the Adversary Proceeding.

8. The Adversary Proceeding will not be disrupted or unduly delayed as a result of this firm's withdrawal as BP Defendants' counsel.

9. Accordingly, cause exists to grant the application authorizing Becker & Poliakoff LLP to withdraw as counsel for the BP Defendants.

Dated: August 4, 2015
New York, New York

/s/ Helen Davis Chaitman